

### **REMARKS / ARGUMENTS**

Please note that the claim amendments provided above are offered for the purpose further limiting claim 1 consistent with the specification, and incorporating existing limitations of dependent claim 18 into independent claim 9. *Consequently, no new matter has been added to the claims, and no new search is required.*

This application is believed to be in condition for allowance because the claims, as amended, are non-obvious and patentable over the cited references. The following paragraphs provide the justification for this belief. In view of the following reasoning for allowance, the applicants hereby respectfully request further examination and reconsideration of the subject patent application.

#### **1.0 Objections to the Specification under 35 U.S.C. §132:**

The Office Action of January 12, 2005 maintained three of four of the objections to the substitute specification, filed October 17, 2003, under 35 U.S.C. §132 as containing new matter which is not supported by the original specification.

#### **1.1 Objection to Page 13, Lines 11-15 of the Specification:**

In the "Examiner's Response" to part (A) of the objection, provided on page 3 of the current Office Action, the Office Action objects to page 13, lines 11-15 of the substitute specification which states "*during a raster transformation of the first and second sets of digital data, multiple images of the digital data are placed in texture memory as multiple textures. Then, statistics are gathered concerning the textures, and the raster transformed sets of digital data are compared and matched against corresponding portions of each other.*"

Specifically, the first point raised by the Office Action suggests the following:

1. "The originally filed specification explicitly and repeatedly describes that a first set of digital data represents a template (also described as an 'object' or a 'portion of an image'), and a second set of data represents an image. The disclosure makes it abundantly clear that a "template" is not an image in and of itself, but merely represents an 'object' located in an image."

The Office Action then raises three more points by suggesting that the cited statement "adds new matter in three different respects" as follows:

2. "...the original specification does not support a transformation of both the first and second sets of digital data. As was stated above, the original specification described transforming one or the other, but not both."
3. "...the original disclosure does not support storing images in texture memory. As was stated above, the original specification explicitly stated that the texture memory stored objects or templates of an image, it failed to disclose that the texture memory stored images."
4. "...the original disclosure does not support storing images in texture memory. It has support for representing a template as a texture, but not for representing an image as a texture."

The Office Action then continued by raising a fifth point, as follows:

5. "...the excerpt cited by the applicant [page 10, lines 11-19] merely supports the gathering of statistics between two colors. It does not support gathering statistics concerning texture. The original specification did not explicitly define the term 'texture', so the examiner has defined this term as it is known in the art (i.e., the degree of smoothness of an object surface)..."

In response, the Applicants respectfully suggest that no new matter has been added with respect to the cited material. However, Applicants have made a minor amendment to the

cited text which it is believed satisfies the objections raised in the Office Action with respect to page 13, lines 11-15 of the substitute specification under 35 U.S.C. §132. Specifically, the points raised by the Office Action, and as summarized above, are fully discussed in the following paragraphs (Sections 1.1.1 through 1.1.5). In view of the following discussion, the Applicants respectfully request withdrawal of the objection to page 13, lines 11-15 of the substitute specification.

**1.1.1 Point 1 of the Objection to Page 13, Lines 11-15 of the Specification:**

As noted above, the first point raised by the Office Action with respect to page 13, lines 11-15 of the substitute specification suggested that "The disclosure makes it abundantly clear that a "template" is not an image in and of itself, but merely represents an 'object' located in an image." However, the Office Action also admits that the template is also originally described as a "portion of an image."

It should be clear that a portion of an image is still an image. For example, by way of analogy, if a photographic image is cut into several pieces, the result is several smaller photographic images, each representing some portion of the original photographic image. These pieces of the original image do not magically cease to be images simply because they are only portions of the original photograph. Similarly, if one were to cut out a picture of a car from a photograph (e.g., an 'object' located in the photograph), the picture of the car that is cut from the photograph is still the exact same picture of a car, even if that "object" removed from the photograph is itself only a "portion of an image."

Consequently, the argument offered by the Office Action that templates can not be images, because they are only an "object located in an image," does not seem to have a logical basis. Therefore, the Applicants respectfully suggest that with respect to both the original and substitute specifications, templates are images, and that this fact is fully supported in the original specification, and that the clarification of this point in the substitute specification does not in fact add new matter.

**1.1.2 Point 2 of the Objection to Page 13, Lines 11-15 of the Specification:**

As noted above, the second point raised by the Office Action with respect to page 13, lines 11-15 of the substitute specification was that “the original specification does not support a transformation of both the first and second sets of digital data.” The Office Action further states that “*the original specification described transforming one or the other*, but not both.”

In response, the Applicants have amended the specification to more clearly reflect the original intent of the text in question. In particular, the text now recites:

“Further, during a raster transformation of the first **or** second sets of digital data, multiple images of the digital data are placed in texture memory as multiple textures.” (emphasis added)

In particular, the applicants acknowledge that as admitted by the Office Action, either of sets of digital data can be transformed, as supported by the original specification. Therefore, Applicants have amended the text to recite that either the first “**or**” second set of digital data is transformed. Applicants believe that this amendment fully addresses the concern raised by the Office Action with respect to the first point of the rejection.

**1.1.3 Point 3 of the Objection to Page 13, Lines 11-15 of the Specification:**

As noted above, the third point raised by the Office Action with respect to page 13, lines 11-15 of the substitute specification was that “the original disclosure does not support storing images in texture memory.” The Office Action further suggested that “the original specification explicitly stated that the texture memory stored objects or templates of an image, it failed to disclose that the texture memory stored images.”

As discussed above, templates are images. Applicants do not believe that this point should be at issue. Further, In view of the following discussion, the Applicants respectfully suggest that the Office Action has confused the *use* of “texture memory” in a computer

graphics card with treating image data as a “texture” for the purpose storing that image data in texture memory. In addition, Applicants respectfully suggest that the Office Action has also incorrectly “defined” the term “texture” as it is commonly used with computer graphics cards.

In particular, as is well known to those skilled in the art, textures (sometimes also conventionally referred to as “texture maps”) are simply **images** that are blended with other images (typically using alpha values), or simply “mapped” to other images (analogous to simply pasting wall paper on a freshly painted wall), to create a composite image which has the appearance of texture on the surface of the object to which that texture image was applied. It should be noted that although the composite or resulting image is 2D. Consequently, it should be clear that in terms of conventional use with computer graphics cards, a texture does **not** actually represent a “degree of smoothness of an object surface” as suggested. Further, this interpretation of “texture”, as offered by the Office Action, is in direct conflict with of the commonly accepted use of textures with conventional computer graphics cards.

For example, a conventional computer graphics card may blend a texture of “bricks” with an image that is a simple rectangle to create the appearance of a rectangular brick wall. Note that in this example, the brick texture **and** the rectangle are **both** images. This concept is very well known to those skilled in the art. However, the Office Action is apparently interpreting these concepts in a manner that is clearly in conflict with the conventional state of the art in computer graphics cards.

#### **1.1.4 Point 4 of the Objection to Page 13, Lines 11-15 of the Specification:**

As noted above, the fourth point raised by the Office Action with respect to page 13, lines 11-15 of the substitute specification was that “the original disclosure does not support storing images in texture memory. It has support for representing a template as a texture, but not for representing an image as a texture.”

However, in contrast to the position advanced by the Office Action, and as explained above, it should be clear that a template is an image. Therefore, Applicants respectfully suggest that this point is insufficient to raise a new matter rejection.

**1.1.5 Point 5 of the Objection to Page 13, Lines 11-15 of the Specification:**

As noted above, the fifth point raised by the Office Action with respect to page 13, lines 11-15 of the substitute specification was that “the excerpt cited by the applicant [page 10, lines 11-19] merely supports the gathering of statistics between two colors. It does not support gathering statistics concerning texture. The original specification did not explicitly define the term ‘texture’, so the examiner has defined this term as it is known in the art (i.e., the degree of smoothness of an object surface)”

However, in contrast to the position advanced by the Office Action, and as clearly explained above, the templates that are stored to texture memory are images. These template “images” have colors assigned to each pixel of the templates. The mere fact that the claimed invention stores these templates to a texture memory of a computer graphics card does not, and can not, serve to transform those images to a “degree of smoothness of an object surface.” In fact, Applicants do not believe that the interpretation offered by the Office Action makes any sense when it is understood to be referring to the “texture memory” of a computer graphics card.

**1.2 Objection to Page 13, Lines 26-29 of the Specification:**

In the “*Examiner’s Response*” to part (B) of the objection, provided on page 3-4 of the current Office Action, the Office Action objects to page 13, lines 26-29 of the substitute specification which states “*as the data is passed through the rasterization pipeline of the graphics processor, statistics between the textures are gathered and processed via the statistical comparison processor.*” The Office Action then suggests that the original specification does not “describe that the statistical comparison processor gathers statistics ***between texture*** values.” The Office Action then incorporates the discussion of “textures”

from part (A) of the objection, as discussed above. Next, the Office Action cites text quoted by the Applicant, "***instead of rasterizing the texture into the frame buffer, certain statistics can be recorded...***," and suggests "Applicant is ***apparently making the assumption*** that the normalized correlation or variation statistics are determined with respect to the texture" (emphasis added).

First, Applicants would like to respectfully inform the Examiner that they are ***not assuming*** anything. Applicants fully understand what they wrote in the original specification, and have no need to make any assumptions whatsoever as to the meaning intended by the cited text. The suggestion offered by the Office Action that the Applicants somehow find it necessary to ***assume*** what is meant by text that was ***originally written by the Applicants*** is without support and completely without merit. Applicants clearly stated in the original specification that certain statistics are gathered ***instead of rasterizing the textures*** (which are images as explained above). There is no ambiguity to the cited text. Consequently, the originally cited text offers full support to the clarified text that was offered in the substitute specification, especially in view of the Applicants prior arguments to this point, filed 27 July, 2004, which are incorporated herein by this reference.

For example, as previously explained by the Applicants, the original specification describes the use of textured triangle rasterization techniques for template matching on page 16, lines 3-7 as follows:

"In one specific embodiment of the example of FIG. 5, ***the template is treated as a texture*** and the frame buffer an image and the display primitive for rendering purposes is a triangular polygon. In addition, ***instead of rasterizing the texture into the frame buffer, certain statistics can be recorded for normalized correlation or other statistics can be recorded for variations.***" (emphasis added)

Clearly, the above-cited text, drawn from the original specification, fully supports and discloses "gathering statistics between textures." Consequently, the Applicants respectfully suggest that no new matter has been added in page 13, lines 26-29, of the substitute

specification. Therefore, the Applicants respectfully traverse the contention of new matter in page 13, lines 26-29 of the substitute specification, and request that the objection to the text of page 13, lines 26-29 of the substitute specification be withdrawn.

### **1.3 Objection to Page 23, Lines 1-3 of the Specification:**

In the "*Examiner's Response*" to part (D) of the objection, provided on page 4 of the current Office Action, the Office Action objects to page 23, lines 1-3 of the substitute specification which states "it has been observed that textured triangle rasterization performed in a conventional graphics processor or the like closely resembles sparse matching of a template with an image."

The Applicants believe that the cited text neither adds new matter to the specification, nor in any way expands the scope of either the claims or of the invention described by the specification. In fact, Applicants respectfully suggest that the cited text serves merely to improve the readability of the specification as a whole. However, for purposes of furthering prosecution of the subject patent application, Applicants have deleted the objected to text by way of an amendment to the specification, as illustrated on page 2 of this response. Consequently, Applicants respectfully suggest that the objection to the cited text has been overcome by deletion of the objected to text.

### **2.0 Rejections under 35 U.S.C. §102(b):**

In the Office Action of May 3, 2004, claims 6-8 were rejected under 35 U.S.C. §102(b), as being anticipated by Sacks, et al. ("**Sacks**," U.S. Patent 4,736,437 A).

A rejection under 35 U.S.C. §102(b) requires that the Applicant's invention was described in a printed publication more than one year prior to the date of application for patent in the United States. To establish that a printed publication describes the Applicant's invention, all of the claimed elements of an Applicant's invention must be considered, especially where they are missing from the prior art. If a claimed element is



not taught in the referenced patent, then a rejection under 35 U.S.C. §102(b) is not proper, as the Applicants claimed invention can be shown to be patentably distinct from the cited reference.

## 2.1 Rejection of Claims 6-8 over Sacks:

In the rejection of claims 6-8, the Office Action again states that Sacks et al. ("**Sacks**," US Patent 4,736,437) describes that an angle rotator initially rotates the scanning line of the information stored in the reference memory 16 (i.e., rendering model transformations)." The Office Action then equates this "angle rotator" feature to the graphics rasterizer described by the Applicants.

However, as previously explained by the Applicants, the pattern recognizer described by **Sacks** is not capable of performing the claimed process of **rendering model transformations**. For example, on page 19, lines 13-16 of the Applicants' substitute specification, the Applicants' explain that "... a transform is applied to either the input image or the template, in order to find **transformed versions** of the template object. **Typical transformations include combinations of rotations, scales and perspective transforms...**" (emphasis added).

In stark contrast, **Sacks** does not appear to be capable of performing such transformations. In particular, rather than actually performing any such transformations, **Sacks** discloses simply reading a stored video memory from various scan line angles. However, the ability to read a stored video memory from various scan line angles is in no way equivalent to actually **rendering a model transformation**. In fact, **Sacks** actually **teaches away** from performing such transformations.

Specifically, as described by **Sacks** in col. 6, lines 29-35:

"The function of the pattern recognizer is based upon the principal of first **loading reference data** concerning a part under investigation from the video

input 14 through the CPU 10 and *into a reference memory 16*. The CPU 10 also controls a *rotator 18 that is capable of reading out the addressed information in the reference memory 16 along any scan line* varying from zero through 360 degrees. *The rotator 18 controls the angle of scan and does not physically rotate anything but simply allows the reference memory located in 16 to be scanned out at any selected scan angle.* (emphasis added)

Clearly, in view of the above-quoted text, **Sacks** is *not* rotating or otherwise transforming images in the manner disclosed and claimed by the Applicants. In fact, it is only reading a 2D video memory at various scan angles. Further, as noted above **Sacks** specifically states that the angle “rotator 18 *does not physically rotate anything*” (emphasis added). In addition, the Applicants’ believe and respectfully suggest that those skilled in the art would simply not accept the proposition that reading a video memory along a scan line is equivalent to *rendering model transformations* as performed by a *3D graphics rendering device*.

In addition, because **Sacks** specifically states that the angle “rotator 18 *does not physically rotate anything*” (emphasis added), there is no support for the contention by the Office Action that **Sacks** discloses the claimed element of “*adjusting the model transformations based on the accumulated statistics*” (emphasis added). Clearly, in this context, simply rotating a video memory scan line can not be considered an adjustment to a model transformation as disclosed and claimed by the Applicants.

Further, the **Sacks** reference also explains that it is “*impractical*” to employ conventional image rotation techniques and that the described rotating scan line reads of image memory are preferable to those conventional techniques. In particular, in col. 5, lines 19-32, **Sacks** explains that:

“*Prior art systems for electronic image rotation* required enormous calculation and storage capacity. The calculation time required and the

hardware necessary to implement the rotation operation ***made it impractical to employ rotational correlation in prior art systems.***” (emphasis added)

“In the present invention the rotation is achieved by calculating only six variables for each angle to be stored in memory. This means that it is possible to rotate 360 angles with a minimal amount of memory and, further, that it is possible to implement all procedures in fast real time hardware since there is no requirement for multiplication or trigonometric function computation and no complicated or expensive hardware other than simple accumulators or adders.”

Consequently, the Applicants respectfully suggest that **Sacks** not only fails to disclose the Applicants claimed ***3D graphics rendering system for rendering model transformations***, it also specifically ***teaches away*** from performing such transformations. However, in order to further clarify the scope of claim 6, Applicants have amended claim 6 to further limit the claimed model transformations. In particular, the claimed model transforms are now limited to “***combinations of rotations, scales, perspective transforms, and translations.***”

Clearly, in view of the above-cited discussion of the **Sacks** “angle rotator 18,” it is clear that **Sacks** is not capable of performing other transforms, including, for example, scales, perspective transforms, and translations. Further, since **Sacks** is incapable of performing these other transforms, it is also inherently incapable of performing combinations of such transforms.

Therefore, it is clear that the present invention, as claimed by independent claim 6, as amended, includes elements not taught in the **Sacks** reference. Consequently, the rejection of independent claim 6, as amended, and of dependent claims 7-8, under 35 U.S.C. §102(b) is not proper. Therefore, the Applicants respectfully request reconsideration of the rejection of claims 6-8 under 35 U.S.C. §102(b) in view of the novel

language of claim 6, as amended. In particular, claim 6 recites the following novel language:

“A method for comparing and matching a first set of digital data to at least a second set of digital data, comprising:

loading at least one of the first and second sets of digital data into a first memory device;

using ***a 3D graphics rendering device for rendering model transformations*** and accumulating statistics of the loaded digital data, said ***3D graphics rendering device modified to include a statistical processor, and said model transformations including combinations of rotations, scales, perspective transforms, and translations***;

***adjusting the model transformations*** based on the accumulated statistics;  
and

statistically comparing and matching the model transformations of the loaded set of digital data to appropriately corresponding portions of the other set of digital data.” (emphasis added)

### **3.0 Rejections under 35 U.S.C. §103(a):**

In the Office Action of January 12, 2005, claims 1-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over **Sacks**, Segal et al (the book entitled “The OpenGL<sup>®</sup> Graphics System: A Specification (Version 1.2.1)”) (hereinafter **Segal**), and further “in combination with well known prior art.” In addition, claims 9-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over of Neff et al. (“**Neff**,” U.S. Patent 5,809,171 A), **Segal**, Skoglund, et al. (U.S. Patent 6,418,243) and further “in combination with well known prior art.”

In order to deem the Applicant’s claimed invention unpatentable under 35 U.S.C. §103(a), a prima facie showing of obviousness must be made. However, as fully explained by the M.P.E.P. Section 706.02(j), to establish a prima facie case of

obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, ***the prior art reference (or references when combined) must teach or suggest all the claim limitations.***

Further, in order to make a prima facie showing of obviousness under 35 U.S.C. 103(a), all of the claimed elements of an Applicant's invention must be considered, especially when they are missing from the prior art. If a claimed element is not taught in the prior art and has advantages not appreciated by the prior art, then no prima facie case of obviousness exists. The Federal Circuit court has stated that it was error not to distinguish claims over a combination of prior art references where a material limitation in the claimed system and its purpose was not taught therein (*In Re Fine*, 837 F.2d 107, 5 USPQ2d 1596 (Fed. Cir. 1988)).

### 3.1 Rejection of Claims 1-5:

In general, the Office Action rejected independent claim 1 under 35 U.S.C. §103(a) based on the rationale that "it is well known in the prior art to use a computer graphics card for raster transforming at least one of the first set of digital data and the second set of data and performing a pixel acceptance test using a pixel acceptance tester." The Office Action then continued by suggesting that "it is ***not well known in the prior art*** to a) accumulate statistical information for each of the first set of digital data and the second set of digital data using a statistical processor... and b) to include the statistical processor in the computer graphics card." (emphasis added)

The Office Action responded to the Applicants prior arguments by explaining that the "Sacks reference, on the other hand, is used to show the specifics of the claimed statistics processor. Applicants argue that this reference fails to teach the raster

transformation as recited in the claim. This argument has been addressed with respect to claim 6 above, and will not be repeated."

As noted above, the **Sacks** reference fails completely to disclose combinations of various transforms, including, for example, various combinations of raster transformations including combinations of rotations, scales, perspective transforms, and translations. As with claim 6, claim 1 has been amended to include this limitation.

Therefore, in view of the preceding discussion, it should be clear that the **Sacks** reference fails to disclose the Applicants' claimed "statistical processor" which performs statistical comparisons between sets of raster transformed digital data based upon the results of a pixel acceptance test, with those raster transforms being various combinations of "rotations, scales, perspective transforms, and translations."

Thus, it is clear that the present invention, as claimed by independent claim 1 includes elements not taught in the proposed **Prior Art-Sacks-Segal** combination reference. Consequently, the rejection of independent claim 1 and of dependent claims 2-5, as amended, under 35 U.S.C. §103(a) is not proper. Therefore, the Applicant respectfully requests reconsideration of the rejection of claims 1-5 under 35 U.S.C. §103(a) in view of the novel language of claim 1, as amended. In particular, claim 1 now recites the following novel language:

"A method for comparing and matching a first set of digital data to at least a second set of digital data, comprising:

using a computer graphics card for **raster transforming** at least one of the first set of digital data and the second set of digital data, **said raster transformations including combinations of rotations, scales, perspective transforms, and translations;**

**depending upon the results of a pixel acceptance test** performed by an acceptance tester included in the computer graphics card, **performing a statistical comparison between at least part of the first set of digital**

***data and at least part of the second set of digital data using a statistical processor included in the computer graphics card; and***  
wherein the statistical comparison includes ***statistically comparing and matching the raster transformed sets of digital data to appropriately corresponding portions of each other using the statistical processor.***” (emphasis added)

### 3.2 Rejection of Claim 9:

With respect to claims 9-10, 12-17 and 19-20, the Office Action rejected independent claim 9 under 35 U.S.C. §103(a) as being unpatentable over the combination of Neff et al. (“**Neff**,” U.S. Patent 5,809,171 A), **Segal**, Skoglund, et al. (“**Skoglund**,” U.S. Patent 6,418,243) and further “in combination with well known prior art.”

In particular, the Office Action first suggested that Applicants “describes that the system can be embodied in a conventional computer graphics card that has been modified to include the statistical comparison processor (see applicant’s specification: page 4, lines 26-27). Therefore, it is well known in the prior art to use a computer graphics card including a raster transformer that transforms at least one of the templates.”

The Office Action then continued by suggesting, among other things, that col 12, lines 26-39 of the **Skoglund** reference discloses “using alpha values to weight statistics.” However, the Applicants respectfully suggest that the Office Action has badly misinterpreted the **Skoglund** reference with respect to the Applicants claimed invention. In particular, **Skoglund** clearly suggests using a scalar variable denoted by the “alpha” symbol. However, **Skoglund** is **not** referring to **pixel alpha values** which have a very specific meaning, as is well known to those skilled in the art. In fact, **Skoglund** is merely using the “alpha” symbol to denote a scalar variable.

Clearly, the mere use of a variable using the “alpha” symbol as a “scalar value” can **not** serve to disclose the use of “**pixel alpha values for weighting statistical**

**information.**" The two are simply not equivalent. Consequently, the Applicants respectfully suggest that the position advanced by the Office Action with respect to the **Skoglund** reference has absolutely no support whatsoever.

Further, as with claims 1 and 6, claim 9 has also been amended to **combinations** of various transforms, including, for example, various combinations of raster transformations including combinations of rotations, scales, perspective transforms, and translations. As noted above, the **Sacks** reference fails completely to disclose any such limitation. Therefore, in view of the preceding discussion, it should be clear that the **Sacks** reference fails to disclose the Applicants' claimed "statistical processor" which performs statistical comparisons between sets of raster transformed digital data based upon the results of a pixel acceptance test, with those raster transforms being various combinations of "rotations, scales, perspective transforms, and translations."

Therefore, the Applicants respectfully suggest that the proposed **Prior Art-Neff-Segal-Skoglund** combination reference fails to disclose the limitations of the Applicants claimed invention. Consequently, the rejection of dependent claim 9, as amended, under 35 U.S.C. §103(a) is not proper. Therefore, the Applicant respectfully requests reconsideration of the rejection of claim 9, and thus of dependent claims 10, 12-17, and 19-20 under 35 U.S.C. §103(a) in view of the novel language of claim 9. In particular, claim 9 recites the following novel language:

"A system for tracking digital templates of a digital scene defined by plural images, comprising:

a computer graphics card including a raster processor that transforms at least one of the templates, **said transforms including combinations of rotations, scales, perspective transforms, and translations;**

**a statistics enable switch included in the computer graphics card**, wherein accumulation of information for each digital template is enabled when said statistics enable switch is enabled, and wherein said computer graphics card provides the at least one transformed template to a



frame buffer included in the computer graphics card when said statistics enable switch is disabled;

a statistical compare processor included in the computer graphics card that accumulates information for each digital template and statistically compares and matches images associated with the templates for tracking the templates based on the accumulated information when said statistics enable switch is enabled; and

wherein the statistical compare processor allows ***use of pixel alpha values for weighting statistical information*** used by the statistical compare processor for simultaneously and statistically comparing and matching images associated with the templates for tracking the templates." (emphasis added).

### **CONCLUSION**

In view of the above, it is respectfully submitted that claims 1-10, 12-17, and 19-20, as amended, are in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of claims 1-10, 12-17, and 19-20, and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicant kindly invites the Examiner to telephone the Applicant's attorney at (805) 278-8855 if the Examiner has any questions or concerns.

Respectfully submitted,



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